

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO DAVID POPKIN INTERROGATORIES DBP/USPS-54 THROUGH 61**

The United States Postal Service hereby provides institutional responses to the above-listed interrogatories of David Popkin dated August 26, 2011. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno, Jr.
Chief Counsel, Global Business

Kenneth N. Hollies
Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402
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RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN

DBP/USPS-54. Please refer to your response to Interrogatory DBP/USPS-42. Under what circumstances would it be deemed appropriate to utilize the procedure specified in the original hypothetical and under what circumstances would it be deemed inappropriate to do so?

RESPONSE:

DPB/USPS-42 itself refers to DBP/USPS-28; both inquire into the circumstances where an address change can be avoided. The response that has been provided indicates that it would be a decision made in the context of a given discontinuance study. That remains true. Repeating the question does not mean that specific conditions can be identified when accommodation can or cannot be made. Nor does repetition make it possible to specify all of the conditions that would exemplify those found in a discontinuance study that has yet to be completed. Minimizing the disruption that can be a consequence of an address change is an affirmative Postal Service goal, but its actualization, if any, would be found (often many times) in the context of a specific discontinuance study.

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN

DBP/USPS-55. Please refer to your response to Interrogatory DBP/USPS-43 subparts [a] and [b].

[a] Please explain why the Approved Shipper is authorized to provide a receipt for a Certified mailpiece but not for a Certificate of Mailing.

[b] Please confirm, or explain if you are unable to confirm, that all Approved Shippers will accept all of the categories of mail listed in subpart [a] of the response.

RESPONSE:

Retail Access Optimization does not entail any product redefinitions.

(a) The answer to this question is already stated in the response to DBP/USPS-43(b).

(b) The response to DBP/USPS-43(a) already indicates that services described in its first line are not all offered by all Approved Shippers. Whether a particular Approved Shipper would or would not offer all of the services indicated in that response would be decision made based on circumstances present and discretion exercised by local officials.

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN

DBP/USPS-56. Please refer to your response to Interrogatory DBP/USPS-43 subparts [c] through [e].

The original Interrogatory refers to the ability to purchase all quantities of all denominations of postage stamps and not to the method by which an Approved Shipper applies postage to a mailpiece.

RESPONSE:

This interrogatory does not pose any question. To the extent DBP/USPS-56 may be construed as arguing that the previous response misunderstood the question, it is incorrect because the previous question asked about, and the response accordingly addresses, “postage” and not “stamps”.

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN

DBP/USPS-57. Please refer to your response to Interrogatory DBP/USPS-43 subparts [f] and [g]. Subpart [f] of the original response refers to complimentary packaging and Subpart [g] refers to selling packaging. What type of packaging is sold?

RESPONSE:

The identified response already answers this question through its description of “majority sell some form of packaging.” This description properly implies that various types of packaging are sold; since Approved Shippers are independent businesses, the choice of what to sell would presumably be made by respective sellers in consonance with their perceived business needs.

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN

DBP/USPS-58. Please refer to your response to Interrogatory DBP/USPS-44 subpart [b].

- [a] Approximately what percentage of all Consignment operations only sell Forever Stamp [or the corresponding denominated stamp] booklets?
- [b] Approximately what percentage of all Consignment operations only sell Forever Stamp [or the corresponding denominated stamp] rolls?
- [c] Approximately what percentage of all Consignment operations sell both Forever Stamp [or the corresponding denominated stamp] booklets and rolls?
- [d] Approximately what percentage of all Consignment operations sell other denominations or formats of stamps? Please provide details of what do sell.

RESPONSE:

(a-c) Retail Access Optimization has absolutely nothing to do with the forms in which Forever Stamps are sold by consignees: the point is that the many tens of thousands of consignees sell Forever Stamps to customers potentially affected by a discontinuance of a Postal Service operated retail facility. The form or forms of Forever Stamps that respective consignees choose to sell, and how the forms they may choose to sell change over time, presumably reflect consignee choices regarding what their customers prefer. In any event, this information is not readily available because the Postal Service itself has no business need for information in the form this interrogatory purports to express an interest in discovering.

(d) Zero.

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN

DBP/USPS-59. Please refer to your response to Interrogatory DBP/USPS-46.

[a] Please confirm, or explain if you are unable to confirm, that there have been no guidelines issued by Headquarters other than the single section of the Postal Operations Manual.

[b] Please provide any explanation that exists why the percentage of available Saturday retail window service varies among Districts as it does when all of the Districts are using the same criteria.

RESPONSE:

(a) Not confirmed. Hours and days of operation, like thousands of other operational details, are the subject of routine discussion among management officials, both horizontally across management peers and vertically through the chain of command. Some such discussion would invariably be understood as providing guidance or guidelines. Nor can the Postal Service claim that it has searched through every official document to see whether more of them ever touch upon Saturday operations. The previous answer provided the best statement focused directly upon the question posed by the previous interrogatory. The passage of time since that answer was provided has not changed its salience.

(b) The form of this question unintentionally hints at part of the response. Hours and days of operation have grown and changed over time based upon management's understanding of how best to provide retail access through postal operated retail units in concert with reasonable economy and efficiency of operations. More recently management's understanding has also encompassed the fact that retail access is increasingly available through alternate access outlets. As such, what we see today is the consequence of decisions made by thousands of managers over recent decades. The fact of variation across districts itself illustrates that different managers made different

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN

decisions in locations that may also vary in how customers choose to access retail services. While today's challenging environment allows a national focus upon what is happening locally throughout the nation, that has not always been true. It was not that long ago when the Postal Service was funded directly by Congress and operated as a group of regions, each of which had its own operational guidance and publications. While a historian might be able to research the history and provide some insight into when and why the patterns we see today came into existence, the Postal Service as an entity is unable to explain why the patterns we see today exist beyond the observation that the interest in how best to provide customers access to retail service today has never been higher at the national level, and in communities throughout the nation. But the available channels through which retail service can be accessed are also more varied today than they have ever been. So the significance of any one of them, including brick and mortar stores, must be evaluated in a larger context than ever before.

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN

DBP/USPS-60. Please refer to USPS-LR-N2011-1/6.

- [a] Please advise the full heading for columns 4 through 8.
- [b] How was column 8 calculated?
- [c] What use is made of the value shown in column 8?
- [d] On what basis are the individual offices sorted in the printout?
- [e] What is the significance, if any, of the last eleven pages of the Library Reference that are blank except for the reference number?

RESPONSE:

- (a) There are no columns numbered 4 though 8.

The full headings for Columns D, F, G and H, respectively, are follows:

PO within 2 miles

CPU within 2 miles

SOC within 2 miles

APP within 2 miles

Total Points

- (b) Perhaps you are referring to column H. It was calculated through the use of addition. It reflects the totals for Columns D-G for each facility.
- (c) It provides a total for determining the number of alternate sites proximate to the RAO candidate facility.
- (d) The facilities are those in category 2 on page 16 of USPS-T-1.
- (e) Absolutely none.

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN

DBP/USPS-61. Please refer to USPS-LR-N2011-1/6.

- [a] Please advise the full heading for columns 4 through 8.
- [b] How was column 8 calculated?
- [c] What use is made of the value shown in column 8?
- [d] On what basis are the individual offices sorted in the printout?

RESPONSE:

Please see the response to DBP/USPS-60.